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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: June 20, 2000/ 1:07 p.m.

Site Contact(s): Ted A. Hopkins
Phone: 303-966-7652

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Obtain approval to remove shelving/storage racks in both Room 152 Pyrochemical Vault (Unit 90.85) and Room 478, B-Vault (Interim Storage Area, Unit 2501) without submitting a Minor Modification under the B776 DOP.

Discussion

On June 20, 2000, I called James Hindman, CDPHE, to request permission to remove storage racks/shelving on which radioactive mixed wastes were stored in the Pyrochemical vault (Unit 90.85) and B-Vault (ISA) without first submitting a minor modification to the DOP. Our position was that the removal of this type of equipment was not regulated under RCRA Closure. Mr. Hindman agreed and approved this request.

The DOP states in Section 4.5.2 that, "Prior to the decommissioning of each SET, RCRA unit-specific closure information will be submitted to the LRA for review and approval as a minor modification to this DOP under paragraph 127 of RFCA. " The question of the regulatory status of the racks in this Unit revolve around the issue or whether the racks are an integral part of the Unit; does removal of this equipment constitute partial closure; and did the racks come in direct contact with listed waste?

RCRA mixed wastes that were stored in these Units were placed in:

- Double walled small canisters that were both lead lined and contained a water wall; or
- Four liter bottles; or
- 55 gallon containers.

Waste typically stored in these vaults was highly radioactive. SAAM and CAMs were used to monitor these areas. Evidence to support the position the storage racks/shelving never came into contact with RCRA waste includes:

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- The ambient radioactivity in the area. If a release had occurred, the Unit would be a High Contamination Area. Neither supplied air nor respirators are required to enter these areas; and
- Sampling by the Radiological Control Technician (RCTs). Surveys provide analytical data that the storage racks/shelving were not contaminated.

Storage rack/shelving generated during this activity will be managed as either LLW or reused in the building to store mixed residue liquid wastes.

On May 10, 2000, Chris Gilbreath, James Hindman and Edd Kray approved a similar request for the NDT vault, Room 448. In that request, Edd Kray provided the following guidance: "I talked to Chris (Chris Gilbreath) about your intent to remove the racks and water walls from 448. I was concerned about the wording in Section 4.5.2 of the DOP which seems to state you need a minor mod to do this. He (Chris Gilbreath) expressed the opinion that you would need the minor mod to D&D a glovebox or tank. He doesn't see a need to 'minor mod' a simple equipment removal like this....This E-mail constitutes approval to go ahead with 448 decommissioning. You will need approval when you get to the later steps of closure per Section 4.5.1.1."

James Hindman approved our request to remove the storage racks/shelving in these units based on:

- Information supplied in this Contact Record; and
- Supported by the precedence established by the NDT vault approval; and
- Radiological surveys of each vault area.

B777/776 Environmental Compliance personnel recognize that this is not a blanket approval of this type of activity. The decision to grant approval to remove storage racks/shelving cages from each unit was based on the merits of each unit. This Contact Record is intended to document CDPHE's approval of this request.

Contact Record Prepared by: Ted A. Hopkins

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